

UNITED STATES DISTRICT COURT

for the

Southern District of Indiana

United States of America

v.

Thomas Cade Martin

Case No.

1:22-mj-01067

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of November 8, 2022 in the county of Hamilton in the
Southern District of Indiana, the defendant(s) violated:

Code Section

18 U.S.C. §§ 2251(a), 2252(a)(2)

*Offense Description*Sexual Exploitation of a Minor, Distribution of Visual Depictions of Minors
Engaging in Sexually Explicit Conduct

This criminal complaint is based on these facts:

See attached Affidavit.

☒ Continued on the attached sheet.

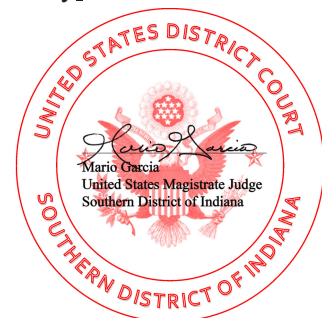
/s/ Andrew Willmann

Complainant's signature

Andrew Willmann, FBI

Printed name and title

Attested to by the applicant in accordance with the requirements of Fed.R.Crim.P. 4.1 by
telephone *(reliable electronic means)*

Date: 12/28/22City and state: Indianapolis, Indiana

AFFIDAVIT IN SUPPORT OF
AN APPLICATION AND ARREST WARRANT

I, Andrew D. Willmann, a Special Agent with the Federal Bureau of Investigation (“FBI”), being duly sworn, depose and state as follows:

INTRODUCTION

1. I am a Special Agent with the Federal Bureau of Investigation, and have been since June 2014. I am currently assigned to the Indianapolis Field Office, Violent Crimes Against Children Task Force. As part of my official duties, I investigate crimes involving the sexual exploitation of minors, including criminal offenses pertaining to online enticement and the illegal production, distribution, receipt, and possession of child pornography. I have received training in the proper investigative techniques for violations pertaining to child pornography and child exploitation. I have conducted and assisted in numerous child exploitation investigations, to include undercover operations to identify and locate individuals who seek to engage in sexual activity with minors and have executed search warrants that have led to seizures of child pornography. I have also received training in computer systems, computer networks, and mobile devices. Moreover, I am a federal law enforcement officer who is engaged in enforcing criminal laws, including 18 U.S.C. §§ 2251 and 2252A, and I am authorized by law to request a complaint and arrest warrant.

2. **Requested Action:** This Affidavit is submitted in support of an application for a criminal complaint and arrest warrant for THOMAS CADE MARTIN (**/**/1996) for violations of: **Count 1:** Sexual Exploitation of MV1, in violation of 18 U.S.C. § 2251, on or about November 8, 2022; and **Count 2:** Distribution of Visual Depictions of Minors Engaging in Sexually Explicit Conduct, on or about November 11, 2022, in violation of 18 U.S.C. § 2252(a)(2).

3. The statements contained in this affidavit are based in part on information provided by U.S. federal law enforcement agents and state and local law enforcement officers; written reports about this and other investigations that I have received, directly or indirectly, from other law enforcements officers; information gathered from the service of administrative subpoenas; the results of physical and electronic surveillance conducted by law enforcement agents; independent investigation and analysis by law enforcement agents/analysts and computer forensic professionals; and my experience, training and background as a Special Agent. Since this affidavit is being submitted for the limited purpose of securing a complaint and arrest warrant, I have not included every fact known to me concerning this investigation. I have set forth only the facts that I believe are necessary to establish that Thomas Cade Martin has violated Title 18, U.S.C. §§ 2251 and 2252(a)(2).

BACKGROUND OF INVESTIGATION

4. On November 21, 2022, the Carmel Police Department (CPD) received a report of sexual misconduct of a male minor victim. Witness 1, whose identity is known to me, is the mother of the minor male victim (Minor Victim 1), hereinafter referred to as MV1. MV1's birthday was **/**/2006 (known to this affiant but redacted). Witness 1 reported to CPD that MV1 told her that he had engaged in sexual activity with a 25-year-old male whose name was Knox Satriano. Witness 1 reported that the name Knox Satriano is fake and not the actual name of the suspect. Witness 1 provided CPD with the phone number that was used by the suspect as 502-492-****. Witness 1 advised that there were photographs on MV1's phone of the suspect, one of which showed the suspect in a Marine Corps uniform. The name placard on the uniform read T. Martin.

5. On or about November 29, 2022, Witness 1 brought MV1 to the Cherish Child Advocacy Center located in Noblesville, IN. During the interview, MV1 told the interviewer that

he was on the social media platform Grindr and met a male named Knox Satriano (Satriano). The victim recalled that after conversations on Grindr with Satriano, he began messaging the suspect on the Snapchat social media platform in which the username for the suspect was “cadegrenade.”

6. MV1 told the interviewer that on or about November 4, 2022, which was the following day, he met the suspect at Carmel City Center complex located in Carmel, Indiana using an Uber ride. According to MV1, MV1 and the suspect got a hot chocolate and walked through the commercial complex. MV1 stated that he went to the top of the parking garage with the suspect, and they kissed while there. Investigators later determined the parking garage located near the City Center complex described by the victim was the Veterans Way Garage located at 100 City Center Dr, Carmel, IN 46032.

7. Carmel is in the Southern District of Indiana.

8. According to MV1, the suspect was a male with light brown/blonde hair, blue eyes, a thin build, and was approximately his height. MV1 stated that the suspect had initially told him that he was 18 years of age. MV1 advised that he told the suspect he was 15 years of age (MV1 was 15 at the time this occurred). MV1 recalled the suspect telling him words to the effect that it was good that the victim found the suspect instead of some other “creeper” out there.

9. According to MV1, he accompanied the suspect to an apartment located at The Residences at Carmel City Center located at an address on the 700 Block of South Rangeline Road, Carmel, IN 46032 (known but redacted). MV1 advised that there was a walkway to two elevators next to the Beauty + Grace business. According to MV1, they used the elevators and went to the 3rd floor, turned left, and entered unit 318. MV1 recalled meeting the suspect’s boss, “Louie” who owned a media company, and someone named “Scott” at the apartment. According to MV1, they were watching television on the couch and the suspect and victim went into one of the

bedrooms and had sexual intercourse. Later in the interview, MV1 described having engaged in sexual intercourse in each of the two bedrooms located in the apartment. The victim advised that he saw paperwork in the complex which had the names Thomas and Martin written on them.

10. According to MV1, on or about the following weekend, November 11 and 12, 2022, MV1 returned to the apartment with the suspect and spent the night with the suspect. MV1 recalled taking a shower with the suspect. MV1 stated that he spent another evening with the suspect on or about the following Tuesday, November 15, 2022.

11. According to MV1, MV1 met the suspect again on or about **/**/ 2022, which was MV1's 16th birthday (known but redacted). MV1 recalled meeting the suspect for dinner at the Cake Bake Shop located in the Carmel City Center complex. MV1 advised that he had dinner with the suspect and the suspect paid for his meal.

12. MV1 advised that the suspect had sent approximately 40 messages to him via text message and Snapchat messenger which contained nude photographs of the suspect. According to MV1, one picture was a nude photograph of the victim and suspect located in the bathtub together in the 318 apartment. MV1 recalled the suspect using the account name "cadegrenade" for Snapchat and "knox.satriano" for Instagram. MV1 also recalled that the middle name of the suspect was Cade because that is what the suspect's mother called the suspect.

13. According to MV1, the suspect told him after the victim's birthday that he was 25 years old and would turn 26 in December. Additionally, the suspect told MV1 that he had been in the Marine Corps.

14. Following the forensic interview, a CPD detective met with Witness 1. Witness 1 shared screenshots of text messages from the MV1's phone between MV1 and the suspect. In addition, the CPD detective observed a photograph depicting MV1 and the suspect in a bed

snuggling with MV1 laying on the suspect's right shoulder. The bedsheet appeared to be white or off-white and a navy-blue comforter with white and navy-blue stripes. Further, there was a photograph of MV1 wearing a red and black checkered pattern jacket. MV1 told investigators that the suspect gave MV1 the jacket.

15. Using the names Thomas, Cade, and Martin given by MV1, investigators determined that Thomas Cade Martin (DOB: **/**/1996) ("Martin") was a former Marine. In addition, Martin was stopped by CPD on or about September 20, 2022, for having an expired plate on a 2013 Toyota Prius bearing Indiana license plate DDP814. The registered owner was Reginald Scott McLemore (DOB: **/**/1966) whose registered address was on the 700 Block of South Rangeline Road Apt. G318, Carmel, Indiana (known, but redacted).

16. According to the bodycam footage of the stop, Martin stated that the Prius belonged to his friend "Scott". Further, and according to the bodycam footage, Martin stated that he was visiting a friend about 34 minutes away from Scott's apartment. Martin was traveling northbound on Keystone Parkway at the time of the traffic stop.

17. Investigators matched the photographs found in MV1's phone depicting MV1 and the suspect to Thomas Cade Martin. Investigators also matched photographs that were found to be linked to the suspect on his publicly available social media accounts, specifically "Cade for Constable" on Facebook. The phone number listed on that page was the same number that was used to contact MV1. Officers also discovered a private Instagram account under the name knox.satriano in which the profile picture matched that of Thomas Cade Martin.

18. On or about November 29, 2022, a CPD detective visited the leasing office for The Residences at Carmel City Center. The CPD detective spoke with the Assistant Manager about the residents of Unit 318. The staff confirmed that Reginald "Scott" McElmore was the renter of unit

G318. Further, the staff was aware that “Louie” was living with Mr. McElmore but was not on the lease. In addition, the staff recalled that a younger male from Kentucky had been periodically coming to Carmel and staying with Mr. McElmore. The staff advised that the male was not on the lease. The staff’s description of the male matched the description and photographs of Martin. The CPD detective then showed a BMV photograph of Martin to the leasing staff, and they confirmed that was the same male they were describing as having periodically visited Unit 318. The staff advised that they most recently saw Martin on November 28, 2022, at approximately noon while using the business center.

19. On or about November 29, 2022, Witness 1 brought the red and black flannel shirt which was given to MV1 by Martin to CPD. The shirt was entered into evidence at the CPD. In addition, Witness 1 showed investigators images on her phone she had taken from MV1’s cell phone. The images showed both MV1 and the suspect nude in a bathtub together. Further, there were images shown of the victim only in which he was nude, and his genitals were exposed. It was apparent that someone else was taking photographs of MV1. A CPD detective observed screenshots of text messages between MV1 and suspect and within those messages was a collection of photographs. Those photographs show MV1 and the suspect together, and the background décor matches that of the Cake Bake Shop.

20. Witness 1 stated that she observed a photograph of the suspect holding a handgun while looking through messages and content on MV1’s cell phone.

21. Based on the above information, law enforcement officers obtained a search warrant for the residence located at the 700 Block of South Rangeline Road, G318, Carmel, IN (known, but redacted). The Honorable Valorie Hahn granted the search warrant for the collection

of photographs, bedding, blankets, sheets, and similar items. In addition, law enforcement officers were authorized to search Martin for electronic devices, photographs, DNA, and fingerprints.

22. Witness 1 advised that she put MV1's cell phone onto airplane mode following the conversation with the Carmel PD on or about November 21, 2022. On or about December 1, 2022, a forensic investigator was able to forensically download MV1's phone and located the photographs of the victim and suspect in the bathtub together. In addition, the investigator observed a photograph of the victim in which his genitals were exposed while in the bathtub. Investigators later determined the bathtub was located in the apartment at the 700 Block of South Rangeline RD, G318, Carmel, IN 46032 (known, but redacted).

23. A CPD Detective reviewed the content on the MV1's cellular device. In the photos application, there was a hidden folder that required a passcode to access the photographs. The CPD Detective observed in that folder multiple photographs of the victim completely nude with his genitals exposed while sitting in a bathtub. In addition, there are photographs of MV1 and Martin laying together in the bathtub completely nude with either their hands or legs covering their genitals. In one of the photographs of the victim in which his genitals are exposed it is apparent that the person taking the photograph is also nude and standing in the bathtub over the victim. The time stamps for the time range of those photographs were from 8:52 PM to 9:04 PM on November 8, 2022.

24. The CPD detective also observed a series of photographs of MV1 and Martin at The Cake Bake Shop starting at 5:51 PM on or about November 16, 2022. This time frame correlated with the statements MV1 gave during the forensic interview. In one of those photographs, Martin was holding an iPhone with a case that appears to have a brown in color wood grain appearance. At approximately 7:26 PM there was a TikTok video that was created with the

victim and Martin. The CPD detective observed multiple videos of Martin sitting on a couch in a living room playing with a knife and a handgun. I noticed that there was an Apple-branded desktop-style computer sitting on a table next to the couch which was like what MV1 disclosed during the forensic interview.

25. The CPD detective located Lyft and Uber ride receipts for November 4 and November 5, 2022 showing MV1's cell phone traveled to and from the Carmel City Center complex. These dates and times corresponded with MV1's recollection of his first-time meeting Martin in person.

26. Investigators determined that the picture of MV1 in the bathtub was taken via Snapchat or Instagram. Further, investigators determined that all of the bathtub photographs were taken with an iPhone 11 Pro Max on November 8, 2022, around 9:01 PM. The iPhone 11 Pro Max was not the same model as the iPhone belonging to MV1. The photographs appeared to have been taken with another iPhone not belonging to MV1.

27. MV1's cellular telephone contained a text conversation that occurred on or about November 4, 2022, around 11:00 PM. The text conversation was between MV1 and a contact that is known to law enforcement. In those messages, MV1 stated that he had a boyfriend. MV1 then sent the individual a picture of himself and Martin together. Another photograph was later sent by MV1 depicting Martin from the waist up with his shirt off. MV1 went on to discuss that on the evening of November 4, 2022, he met with the suspect and got hot chocolate. He then talked about kissing between the two and then later discusses how the two engaged in sexual intercourse in a conference room. MV1 then stated that the suspect is 19 years of age and that the suspect knows that the victim is only 15 years of age. MV1's friend told MV1 that the suspect is a pedophile and will go to jail.

28. On or about December 2, 2022, a review of the video surveillance footage of the Veterans Way Garage cameras showed MV1 and Martin walking out of the staircase onto the 5th floor of the garage at approximately 8:50 PM on November 4, 2022. This time frame correlated with MV1's recollection of events and the Lyft receipts located showing that MV1 was dropped off at approximately 8:20 PM and picked up at approximately 10:09 PM from the City Center complex area. MV1 and Martin were wearing the same clothing that was observed in a selfie photograph taken on or about November 4, 2022, in the access hallway by the Addendum business next to an electrical panel labeled 159.

29. The surveillance footage from Veterans Way Garage on or about November 4, 2022, shows at approximately 8:53 PM, MV1 and Martin were hugging and kissing. Martin then kneeled in front of MV1 and with MV1's shirt partially raised Martin appears to be kissing the stomach of the victim.

30. On or about December 3, 2022, at approximately 10:15 AM, the CPD Criminal Investigation Division conducted surveillance of Martin. At approximately 11:30 AM, Martin was in in the back of the Toyota Prius owned by Mr. McElmore near the Target store near 86th Street in Indianapolis. The vehicle then traveled eastbound on 86th Street and northbound on Keystone Parkway. The Carmel PD patrol division was notified, and a traffic stop was conducted on Keystone Parkway near Carmel Drive. A CPD detective confirmed that Martin was in the back seat of the vehicle, and he was detained. The CPD detective asked Martin whether he had a cellphone and Martin advised that his cell phone was in the Toyota. The CPD detective located the Apple iPhone 11 Pro Max cell phone in the back seat of the vehicle. The cell phone was in a brown in color wood grain case as observed in the photograph on November 16, 2022, at the Cake Bake Shop in which the suspect was holding that device. In addition, the CPD detective called the

number that was used by the suspect when communicating with MV1 and the cell phone belonging to Martin began to ring.

31. Martin was transported to the Hamilton County Jail by a CPD officer. Martins' cell phone was placed into evidence.

32. On or about December 3, 2022 at approximately 2:23 PM, officers executed the search warrant of the residence located at the 700 Block of South Rangeline Road, G318, Carmel, IN (known but redacted). Photographs of the residence were taken. Investigators observed in one of the bedrooms large S and M letters on the wall that match a photograph of MV1 standing in front of those items. In addition, the bathroom layout matched the description portrayed in the photographs of MV1 and Martin together nude in the bathtub. The two bedrooms contained bed furniture and bedding that were observed in the photographs of MV1 and Martin snuggling together. There were other items throughout the home that were photographed as the décor matched numerous photographs of MV1 and Martin together. Pillows, sheets, and other bedding were collected and placed into evidence.

33. On or about December 8, 2022, this affiant received a preliminary forensic examination of MV1's Apple iPhone. This affiant subsequently reviewed the preliminary forensic examination. MV1's iPhone contained multiple pictures of himself and Martin in a bathtub. Both MV1 and Martin were completely nude. One file labeled **IMG_7323.HEIC** was a "live photo" or an approximately three second moving image created with an iPhone camera. Live photos appear to be short, approximately three second videos when viewed in their entirety. **IMG_7323.HEIC** depicted MV1 sitting entirely nude and cross legged in the bathtub, located at the 700 Block of South Rangeline Road, G318, Carmel, IN 46032 (known but redacted), containing water while looking up at the camera. MV1's face, penis, and scrotum are the focal point of the "live photo".

IMG_7323.HEIC appeared to have been taken by a second person. The created date listed on Exif data associated with **IMG_7323.HEIC** was November 8, 2022.

34. Based on my training and experience, **IMG-7323.HEIC** meets the definition of child pornography under 18 U.S. Code § 2256 as a lascivious exhibition of the anus, genitals, or pubic area of a minor.

35. A live photo labeled **IMG_7348.HEIC** depicted Martin and MV1 both sitting in the bathtub. Both Martin and MV1 appear to be nude. Their genitalia is covered with MV1's legs and hand. Martin appears to be taking the photograph by reaching out his arm to take a "selfie" photograph. MV1 is depicted showing the two finger "peace" sign with his left hand. **IMG_7348.HEIC** was contained on MV1's Apple iPhone and had Exif data showing a created date of November 8, 2022.

36. Exif Data associated with both **IMG_7323.HEIC** and **IMG_7348.HEIC** showed that the live photos were taken with an Apple iPhone 11 Pro Max. Martin's phone was an Apple iPhone 11 Pro Max. The series of live photos appeared to show that Martin took the images.

37. MV1's cellular telephone contained a series of iMessages that were sent by the user of 502-492-****. Martin's Apple iPhone 11 Pro Max rang when officers called the number 502-492-****. iMessages are described as texts, photos, or videos that one sends to another person using an iPhone, iPad, iPod Touch, or Mac over Wi-Fi or cellular-data networks.

38. **IMG_7323.HEIC** and **IMG_7348.HEIC** appeared to be sent over iMessage to MV1 by the user of 502-492-**** on or about November 11, 2022.

39. **Interstate or foreign commerce:** Grindr and Snapchat are social media applications that are facilities of interstate commerce. Apple iMessage is an online chat function

that is a facility of interstate commerce. Martin's Apple iPhone 11 Pro Max cellular telephone was manufactured outside the State of Indiana.

CONCLUSION

40. Based on my training and experience, and the facts as set forth in this affidavit, there is probable cause in support of an application for a criminal complaint and arrest warrant for Thomas Cade Martin (**/**1996) for violations of: **Count 1:** Sexual Exploitation of MV1, in violation of 18 U.S.C. § 2251, on or about November 8, 2022 and **Count 2:** Distribution of Visual Depictions of Minors Engaging in Sexually Explicit Conduct, on or about November 11, 2022, in violation of 18 U.S.C. § 2252(a)(2).

41. Based on my training and experience, **IMG-7323.HEIC** meets the definition of child pornography under 18 U.S. Code § 2256 as a lascivious exhibition of the anus, genitals, or pubic area of a minor. The image was produced by Martin on or about November 8, 2022. Martin distributed the live photo to MV1 on or about November 11, 2022. Martin's Apple iPhone 11 Pro Max was seized on or about December 3, 2022.

/s Andrew Willmann

Andrew Willmann, Special Agent
Federal Bureau of Investigation

Attested to by the applicant in accordance with the requirements of Federal Rules of Criminal Procedure 4.1 and 41(d)(3) by telephone.

12/28/22

